

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Idaho State Office
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September 2, 2004

EMS
Instruction Memorandum No. ID-2004-104
Expires: 09/30/2005

To: All State Office Employees

From: State Director

Subject: Hearing Conservation Program (HCP) for the Idaho State Office

Program Area: Health and Safety.

Purpose: The purpose of this Instruction Memorandum (IM) is to establish policy and guidelines for the Bureau of Land Management (BLM) HCP at the Idaho State Office.

Policy/Action: The BLM HCP provides guidelines for BLM Idaho State Office employees to protect themselves against the effects of occupational noise exposure.

Timeframe: This IM is effective immediately.

Background: Historically, BLM state offices have functioned under their statewide policies and guidelines. The BLM Safety and Health Team decided that OSHA will consider State Offices as a facility. This means that each State Office needs to have site specific written OSHA plans. This IM is to establish the BLM HCP for the Idaho State Office.

Manual/Handbook Sections Affected: None.

Coordination: This IM was coordinated with the BLM Idaho State Safety and Occupational Health Manager, BLM Idaho Human Resources Officer, BLM Idaho DSD for Support Services, and BLM Idaho DSD for Resources.

Contact: For questions or further information, please contact Lin Buck, BLM Idaho State Office Safety and Health Officer at (208) 373-4097.

Lower Snake River District with Union: No Union notification or negotiation is required.

Signed by:
K Lynn Bennett

Authenticated by:
Susanna M. Henry
Staff Assistant (ID-933)

Attachment

1 – BLM Hearing Conservation Program (HCP) for Idaho State Office

HEARING CONSERVATION PROGRAM (HCP)

Idaho State Office

I. POLICY

Following State and Federal guidelines, the BLM Idaho State Office will provide protection against the effects of occupational noise exposure. Our Hearing Conservation Program (HCP) includes:

- A. Noise Exposure Monitoring
- B. Engineering and Administrative Controls
- C. Audiometric Evaluation
- D. Use of Hearing Protection Devices
- E. Education
- F. Record Keeping
- G. Evaluation

II. MONITORING

Employees are entitled to observe monitoring procedures and we will notify them of the results of the exposure monitoring. Employees have the responsibility of sharing their knowledge about the production environment, the machinery, and specific operations with those who are measuring the noise so we accurately identify the noise. We will repeat the noise sampling when changes occur in production, process, or when controls increase noise exposure. Such changes may also mean that additional employees need to be monitored and/or their hearing protectors may no longer provide adequate attention.

The BLM Idaho State Office Safety and Health Officer (SHO) will coordinate with employees to ensure that the measurements represent typical production cycles and that we adequately sample noise levels. The SHO will also ensure that those who are taking the measurements closely follow the policies and procedures established and that we share the results with the employees.

III. ENGINEERING AND ADMINISTRATIVE CONTROLS

The SHO and ISO Safety and Health Committee will identify controllable noise sources, set goals for feasible noise control, and allocate resources to accomplish these goals. They will explore potential administrative controls that will minimize noise exposure. Employees need to

communicate their thoughts to management and those in charge of noise control and operate/maintain their equipment to take full advantage of the noise controls.

IV. AUDIOMETRIC TESTING

Audiometric evaluations are crucial to the success of the HCP since it is the only way to find out whether the hearing conservation actions are preventing noise-induced hearing loss.

We will make baseline and annual audiometric testing available to all employees who are exposed to an action level of 85 dB or above. We should provide baseline audiograms within six months of an employee's first exposure to the action level (please note there is an exception of 12 months if a mobile test van is used to obtain the audiograms).

The SHO will be responsible for the audiometric testing program ISO and will ensure that the individuals reviewing the audiograms determine if standard threshold shifts (STS) have occurred, and will aid in making referrals as necessary.

Audiometric tests will be conducted in a room that meets specific background levels and with calibrated audiometers that meet ANSI specifications of S3-1969.

Funding for all tests will be the responsibility of individual offices, but will be identified and coordinated by the SHO after receipt of each year's Planning Target Allocation (PTA).

Effective communication and coordination among management, health services, and employees are critical to have a successful testing program. Employees need to disclose information about ear problems and prior noise exposures, or problems encountered in taking the test. Supervisors and employees need to follow-up on any recommendations for treatment or further evaluation.

V. HEARING PROTECTION DEVICES

It is BLM's responsibility to follow the OSHA recommended noise levels to make certain all employees are protected against hearing loss. Hearing protection is mandatory for all employees involved in work assignments with the potential for hearing damage. The Risk Management Assessment process will be used to identify hearing protection for site and job specific activities.

Supervisors are responsible for ensuring the purchase and issuing of protection devices and monitoring their use accordingly. They are also responsible for employee compliance in the use of hearing protection while working.

Each employee is responsible for wearing hearing protection in those areas where mandatory use has been designated. Employees are responsible for requesting immediate replacement of lost or damaged hearing protection devices. Employees are responsible for the proper use and cleaning of hearing protection devices. Instructions regarding the proper use and cleaning will be provided to the employees by the SHO, or designated individual(s).

Some people feel that protecting deaf or hearing-impaired employees from noise is not necessary since the “damage has already been done.” This is wrong, medically unsound, and unethical. It is important that ALL EMPLOYEES be properly protected from noise exposure.

VI. EDUCATION

Employees will be trained annually on the effects of noise, the purpose, the advantages and disadvantages of various types of hearing protectors, the selection, fit, and care of protectors; and the purpose and procedures of audiometric testing.

The BLM has set a high priority on safety and realizes that a successful HCP requires commitment, communication, and cooperation between management and employees. Employees are encouraged to contribute to the program by raising questions, concerns, and by informing management when procedures are impractical, suggesting alternatives when possible.

VII. RECORD KEEPING

Noise exposure measurement records must be kept for two years according to 29 CFR 1910.95. The BLM has decided to maintain noise exposure records for the same duration as other exposure records. We must maintain records of audiometric test results for the duration of employment according to 29 CFR 1910.95. The BLM decided to maintain the audiometric test results for the duration of employment plus thirty years as required for other medical records covered under 29 CFR 1910.20. Audiometric test records must include the name, job classification, date, examiner's name, and date of the last acoustic or exhaustive calibration, measurements of the background sound pressure levels in audiometric test rooms, and the employee's most recent noise exposure measurement.

Hearing loss of 25 dB or more at 2000, 3000, and 4000 hertz (Hz) will be recorded as an illness on the OSHA 300 log located in the Safety Management Information System (SMIS). Instantaneous events that result in hearing loss and/or medical treatments are considered injuries and will be recorded as injuries and not illness. We will inform employees in writing within 21 days of the determination of an STS of 10 dB or more at 2000, 3000, and 4000 Hz.

Employees can access their exposure and medical records by contacting Human Resources. Employees are encouraged to take advantage of the record keeping system by inquiring about their hearing status, especially at the time of the annual audiogram.

VIII. PROGRAM EVALUATION

Evaluation of all the HCPs components is necessary to decide the extent to which the program is really working or if there are problems. The SHO and ISO Safety and Health Committee will evaluate the program annually and document the findings and any corrective actions taken. Employees are responsible for providing feedback on the program's merits or shortcoming to their supervisor and safety officer.